

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

In re:

NANCY ANN WORSLEY,

Debtor

Case: 13-71206-SCS

Chapter 13

NANCY ANN WORSLEY,

Plaintiff

v.

APN:13-07042-SCS

**JPMORGAN CHASE BANK, NA
SAMUEL WHITE, PC, TRUSTEE,**

Defendants

**JPMORGAN CHASE BANK, NA
SAMUEL WHITE, PC, TRUSTEE,**

Counterclaim Plaintiffs

v.

**NANCY ANN WORSLEY,
MICHAEL P. COTTER, CHAPTER 13 TRUSTEE,
ROGER D. WORSLEY,
GUY AMUIAL,**

Counterclaim and Third-Party Defendants

ANSWER TO THIRD-PARTY CLAIM

COMES NOW your Third-Party Defendant, Roger D. Worsley, by Counsel, and
for his Answer to the Third-Party Claim filed against him herein states as follows:


1. Your Third-Party Defendant denies the allegations set forth in paragraph 1 of the Third-Party Claim and demands strict proof thereof.
2. Your Third-Party Defendant admits the allegations contained in paragraphs 2 through 4 of the Third-Party Claim.
3. Your Third-Party Defendant denies the allegations set forth in paragraph 5 of the Third-Party Claim.
4. Your Third-Party Defendant admits the allegations contained in paragraphs 6 through 9 of the Third-Party Claim.
5. Your Third-Party Defendant denies the allegations contained in paragraphs 10 through 12 of the Third-Party Claim.
6. Your Third-Party Defendant has insufficient information to allow him to either admit or deny the allegations contained in paragraphs 13 through 16 of the Third-Party Claim and thus denies the allegations contained therein.
7. Your Third-Party Defendant admits the allegations contained in paragraph 17 of the Third-Party Claim.
8. Your Third-Party Defendant denies the allegations contained in paragraph 18 of the Third-Party Claim.
9. Your Third-Party Defendant admits the allegations contained in paragraph 19 of the Third-Party Claim.
10. Your Third-Party Defendant denies the allegations contained in paragraph 20 of the Third-Party Claim.
11. Your Third-Party Defendant admits the allegations contained in paragraph 21 of the Third-Party Claim.

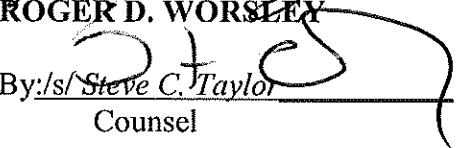
12. Your Third-Party Defendant denies the allegations contained in paragraphs 22 through 45 of the Third-Party Claim.
13. Your Third-Party Defendant admits the allegations contained in paragraph 46 of the Third-Party Claim.
14. Your Third-Party Defendant has insufficient information to allow him to either admit or deny the allegations contained in paragraphs 47 and 48 of the Third-Party Claim and thus denies the allegations contained therein.
15. Your Third-Party Defendant denies the allegations contained in paragraphs 49 through 65 of the Third-Party Claim.
16. Your Third-Party Defendant has insufficient information to allow him to either admit or deny the allegations contained in paragraph 66 of the Third-Party Claim and thus denies the allegations contained therein.
17. Your Third-Party Defendant denies the allegations contained in paragraphs 67 through 78 of the Third-Party Claim.

Affirmative Defenses

18. This claim is barred by claimant's own conduct, or by the conduct of its agents, representatives, and consultants. Specifically, Roger D. Worsley never intended to convey the property to Guy Amuial.
19. That the signature of Roger D. Worsley was procured by fraud.
20. That there was a failure of consideration in that the said Roger D. Worsley never received any sums in exchange for the property.
21. That the said Guy Amuial would have been unjustly enriched by any such transfer.

WHEREFORE, having fully answered, Roger D. Worsley, your Third-Party Defendant, by Counsel, prays that the Third-Party Claim filed against him herein be dismissed; for an award of attorney's fees and costs expended herein; and for such other and further relief as the Bankruptcy Court deems appropriate.



ROGER D. WORSLEY

By: /s/ Steve C. Taylor
Counsel

Steve C. Taylor, Esquire (VSB No. 31174)
Law Offices of Steve C. Taylor, P.C.
133 Mount Pleasant Road
Chesapeake, VA 23322
757-482-5705
757-546-9535 (fax)
familylaw@call54legal.com
Counsel for Roger D. Worsley

Certificate of Service

I hereby certify that a true copy of the foregoing was mailed by prepaid U.S. Mail and/or by electronic mail to the following:

Timothy V. Anderson, Esquire
Anderson & Associates, P.C.
2492 North Landing Road, Suite 104
Virginia Beach, VA 23456

Michael P. Cotter, Trustee
Chapter 13 Trustee
870 Greenbrier Circle, Suite 402
Chesapeake, VA 23320

Jeffrey L. Marks, Esquire
Kaufman & Canoles
2101 Parks Avenue, Suite 700
Virginia Beach, VA 23451

and by electronic means to all creditors and parties-in-interest who are included in the Bankruptcy Court's ECF e-mail notification system.



/s/ Steve C. Taylor